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ALEXANDRA MARWA SABER p/k/a DENIMS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TED ENTERTAINMENT, INC., a
California Corporation,

Plaintiffs,

v.

ALEXANDRA MARWA SABER
f/k/a MARWA TALATT
ABDELMONEM p/k/a DENIMS, an
individual, and DOES 1-10

Defendants.

Case No.: 2:25-cv-05564-WLH-PD

DISCOVERY MATTER

**JOINT STIPULATION RE:
GRANTING PLAINTIFF LEAVE TO
SERVE THIRD-PARTY
SUBPOENAS PRIOR TO THE RULE
26(f) CONFERENCE**

1 **WHEREAS**, plaintiff Ted Entertainment, Inc. (“TEI”) commenced this
2 action by filing its complaint (“Complaint”) on June 19, 2025 alleging: (1) direct
3 copyright infringement against defendant Alexandra Marwa Saber p/k/a Denims
4 (“Denims”); and (2) contributory copyright infringement against Does 1-10 (the
5 “H3Snark Mods”) (Dkt. No. 1);

6 **WHEREAS**, on June 24, 2025, Denims was served with the Complaint (Dkt.
7 No. 12);

8 **WHEREAS**, on June 30, 2025, counsel for Denims contacted counsel for
9 TEI to discuss various preliminary matters related to the present action;

10 **WHEREAS**, also on June 30, 2025, counsel for TEI responded to counsel
11 for Denims and explained, *inter alia*, TEI’s intention to file an *ex parte* application
12 seeking expedited discovery to subpoena Reddit, Inc. (“Reddit”) and Discord, Inc.
13 (“Discord”) to obtain personal identifying information of the H3Snark Mods prior
14 the conference of counsel under Federal Rule of Civil Procedure Rule 26(f) (the
15 “Application”) for the purpose of naming the H3Snark Mods in the Complaint and
16 serving the H3Snark Mods with the Complaint;

17 **WHEREAS**, also on June 30, 2025, counsel for Denims responded to
18 counsel for TEI and requested, *inter alia*, to set up a time to meet and confer
19 regarding the Application;

20 **WHEREAS**, counsel for TEI and Denims (collectively, the “Parties”) agreed
21 to meet and confer on July 1, 2025;

22 **WHEREAS**, on July 1, 2025, counsel for the Parties conducted a telephonic
23 meet and confer regarding the grounds and necessity for the Application;

24 **WHEREAS**, counsel for Denims agreed that TEI’s request to seek expedited
25 discovery from Reddit and Discord to obtain personal identifying information of
26 the H3Snark Mods to name them in the Complaint and serve the H3Snark Mods
27 with the Complaint is warranted under the circumstances;

28 **WHEREAS**, to avoid unnecessary motion practice and conserve the

resources of the Parties and this Court, the Parties have entered into this joint stipulation to request this Court to grant TEI leave to serve subpoenas on Reddit and Discord on condition that counsel for Denims first review the aforementioned subpoenas;

WHEREAS, due to a preplanned Fourth of July holiday vacation, the earliest counsel for Denims could review the proposed subpoenas to Reddit and Discord was July 10, 2025;

WHEREAS, on July 10, 2025, counsel for TEI sent counsel for Denims the proposed subpoenas to Reddit and Discord – to which counsel for Denims does not object;

WHEREAS, a true and correct of the proposed document subpoena to Reddit is attached hereto and incorporated herein as **Exhibit A** (with the date and time of compliance and date of the subpoena was issued left blank); and

WHEREAS, a true and correct copy of the proposed document subpoena to Discord is attached hereto and incorporated herein as **Exhibit B** (with the date and time of compliance and date of the subpoena was issued left blank).

THEREFORE, IT IS HEREBY STIPULATED, by and between the Parties through their respective attorneys of record respectfully request that: (1) this Court grant the Stipulation; (2) that TEI be granted leave to serve the proposed subpoenas attached as Exhibit A to Reddit and Exhibit B to Discord prior to the conference of counsel under Federal Rule of Civil Procedure Rule 26(f); and (3) the Court enter the Order lodged concurrently herewith.

Dated: July 16, 2025

HEAH BAR-NISSIM LLP

By /s/ Rom Bar-Nissim
ROM BAR-NISSIM
Attorneys for Plaintiff Ted
Entertainment, Inc.

1 Dated: July 16, 2025

FROST LLP

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3 By /s/ Ben Kassis

BEN KASSIS

BENJAMIN GRUSH

Attorneys for Defendant

Alexandra Marwa Saber p/k/a

Denims

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6 Pursuant to Civil L.R. 5-4.3.4(a)(2)(1), the filer attest that all other
7 signatories listed, and on whose behalf this filing is submitted, concur in the filing's
8 content and have authorized the filing.
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